



THE CITY OF NEW YORK
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April 11, 2023

BY ECF

Honorable Naomi Reice Buchwald
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Stuart Meissner, et al. v. City of New York, et. al.
23-CV-1907 (NRB)(VF)

Dear Judge Buchwald:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I submit this letter on behalf of Defendants City of New York, New York City Police Department, New York City Police Department License Division ("License Division"), and Nicole Berkovich, Director of the New York City Police Department License Division to seek additional time to respond to the Complaint.

Plaintiffs bring this action on behalf of themselves and those similarly situated to assert Second Amendment and other constitutional claims with respect to the length of the License Division's approval process for handgun licenses. Plaintiffs also seek reciprocity in New York City for concealed carry licenses issued outside New York State, as well as counties within New York State. Plaintiffs ask the court to award compensatory and punitive damages, issue a declaratory judgment, and appoint a federal monitor to ensure that Defendants adhere to constitutional and statutory requirements.

The Complaint raises weighty and complex issues requiring further investigation and research in order to fully respond. The parties have agreed to extend the time to respond to the Complaint for all defendants until June 13, 2023. As the proposed new date does not impact any other schedule, I request that the Court approve such extension. With respect to Defendant Keechant Sewell, Police Commissioner of the New York City Police Department, this office is in the midst of completing the representation process and received a request today from Plaintiffs'

counsel to waive service pursuant to Federal Rule of Civil Procedure 4(d). Accordingly, I respectfully request that the Court, *sua sponte*, extend her time to answer to June 13, 2023, as well.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Nicholas Ciappetta', with a long horizontal flourish extending to the right.

Nicholas Ciappetta
Senior Counsel